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September 7, 2010

The Honorable John Gleeson  
United States District Judge  
Eastern District of New York  
Brooklyn, NY 11201

**RE: United States v. Mohammed Nabil Amadu, 10-CR-190-JG**

Your Honor:

Please accept this letter as the defendant's motion *in limine* to admit the following documents in evidence in the defendant's upcoming trial.

1. School brochure entitled, "Profile of Central University College."

The defense seeks to admit the school brochure as a relevant, self authenticating, exception to the hearsay rule under Fed. R. Evid. 401, 803(17) and 807. See attached "Exhibit A." The brochure is a twelve page color publication of Central University College Ghana. The brochure lists the schools within the university, describes its MBA program, and lists the admission requirements, among other things. The brochure is relevant to prove that the school, and the particular program in which Mr. Amadu was enrolled, actually exist. The brochure has circumstantial guarantees trustworthiness: it is a brochure published for public distribution, and specifically intended for prospective students. The makers of the brochure had no relationship to any of the parties in this case; the motivation to publish the brochure was to promote the school to the public. The brochure also contains contact information such an address, a fax number, a telephone number, and a website address. The brochure contains the names and pictures of school administrators. These circumstances establish the trustworthiness of the contents of the brochure. The brochure is the best evidence available to the defense to prove the existence

of a certain program of study at the Central University College in Accra, Ghana.

2. The Central University College, Matriculation Programme, for the 2006-2007 school year.

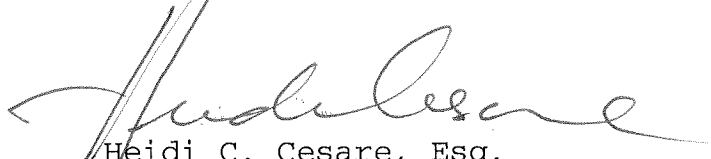
The defense seeks to admit the programme as a relevant, self authenticating exception to the hearsay rule under Fed. R. Evid. 401, 803(17) and 807. The matriculation program is a brochure published by Central University College to commemorate the matriculation of its 2006 class of students. The brochure contains the names and pictures of school administrators, the Order of Ceremony, the Board of Regents, and a list of matriculants for the 2006-2007 school years. The defendant, Mohammed Nabil Amadu, and another person, Prince Bekoe are listed as matriculants. The matriculation brochure is relevant to show that Mohammed Nabil Amadu and Prince Bekoe were fellow students at the university. The brochure has circumstantial guarantees of trustworthiness because it was printed years before this case; the makers of the brochure had no relationship with the parties in this case; and the brochure was intended for the friends and family of the matriculants. The brochure is the best way of proving the material fact that a person known as Prince Bekoe was a matriculated student at the same university as the defendant. *See attached "Exhibit B."*

3. Academic Calendar for the Central University College of Ghana for the 2009/2010 school year.

The academic calendar, a three page document, was obtained from the university website at [www.centraluniversity.org](http://www.centraluniversity.org). The defense seeks to admit the calendar as a relevant, self authenticating exception to the hearsay rule under Fed. R. Evid. 401, 803(17) and 807. The school calendar is a relevant fact in connection with the timing and purpose of the defendant's trip to the United States. The calendar, obtained from the university website, has circumstantial guarantees of trustworthiness: it is publicly available; it is from a legitimate website; and it was created by the university to serve the university community, with no relationship to either party in the case. The school calendar is the best way of proving the 2009-2010 school year schedule at the university. *See attached "Exhibit C."*

Thank you for your attention. Please advise.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Heidi Cesare", is written over a horizontal line.

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enc.

cc: Clerk of the court (by ECF)  
Tyler J. Smith, Esq., AUSA